

PSC Comment Sheet

Proposed Elm Road Coal Units

May 19 and 20, 2003 Draft EIS Comment Meetings

PSC Docket 05-CE-130

FROM

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Representing Citizens for Responsible Power

PLEASE DEPOSIT AT THE
INFORMATION MEETING,

OR...

To mail, fold this sheet
(our address is on the back), or add
additional sheets and put in an envelope,
and send to:

Jeff Kitsembel
PUBLIC SERVICE COMMISSION
PO BOX 7854
MADISON WI 53707-7854

My comments on the draft EIS are:

See Attachment 1

Additional sheets are included: ☒ Yes ☐ No

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Citizens for Responsible Power would like to compliment the DNR and PSC for an objective and comprehensive Draft EIS. However we believe the following areas need to be addressed before the Final EIS is issued:

- 1.0 EGEAS analysis:** the current analysis only includes up to 20% cost over run; additional EGEAS runs should include 30% and 50% cost overruns. Potential cost over runs of this magnitude are not unreasonable. There hasn't been a new coal plant built in Wisconsin since the mid-1980's and there are many unknown and ancillary costs unique to the PTF coal plants relative to the alternatives.

Some examples of unknown and ancillary costs include: unidentified plant/ pollution control complexity, transmission/ interconnection, rail upgrades, rail overpass, massive excavation of lake bluff, water intake, dredging, harbor reconstruction, environmental mitigation of wetlands, critical habitat and environmental corridors.

On page 21 of the DEIS: "PSC engineering staff believe, at this time, that the cost overrun potential for the ERGS is about 10 percent for the SCPC units..." What basis is the PSC using for this belief? Wisconsin Energy has a history of cost overruns dating back to the Pleasant Prairie coal units, which were 30 to 40% over budget. In 1997 WEPCO mismanagement caused the lengthy shutdown of the Point Beach nuclear plant and generated over a \$100-million repair cost overruns. More recently, WE's portion of the Guardian pipeline project has inflated to \$97.5 million from the original estimate of \$62 million.

- 2.0 Railroad/ Coal Trains:** DEIS is deficient in this area drawing much of data from We Energies and WE's consultant Benesch (Grade Separation Feasibility Studies report).

First, We Energies does not plan to deliver coal via lake ship due to high cost and declining lake levels. Also the total number of trains stated in the DEIS doesn't make sense nor does it correspond to the numbers stated in WE' PTF application or Benesch report. The current plant at 1,100MW uses 5.5-trains/125 car /week and the DEIS states 11-trains/135 car /week at 2,930MW (with the 3 new PTF units). Under PTF this is a 270% increase in current generation; therefore the 14-trains/135-car/ week stated in WE's application and the Benesch report mathematically makes more sense than the DEIS.

The DEIS and Benesch only address 7-Mile, 6-Mile and to a lesser extent 4-Mile road. There's no mention of 5-Mile or 3-Mile road and the 19 at grade crossings in Racine. Benesch reported only minor impacts at 5-Mile and 4-Mile. Through out Racine and Caledonia the 9,000 ft long trains travel less than 30 mph and slow significantly as they approach the ERGS, sometime stopping as far back as 4-Mile road.

The Town of Caledonia has not agreed to close 7-Mile road because the traffic counts are running at 320 to 655 vehicles per day, which is much greater than 200 vehicles per day Benesch reported. Future development of this area must be accounted for since the area is zoned for residential at .7 to 2.2/acre. The area east of the tracks has 130 acres of developable land, this would allow for approximately 90-285 dwelling units.

3.0 Air Emissions: according to the DEIS concentrations of particulate matter, especially total suspended particulates (TSP 24-hour), PM10 (24-hour), and SO2 (both 3-hour and 24-hour) would increase substantially due to operation of the ERGS.

Since several of these pollutant concentrations are approaching 100 percent of the NAAQS, it's therefore it's imperative the DNR complete Shoreline Dispersion Modeling (SDM). SDM examines the inversion of the cool lake air breaking down in the warmer air over land and pollutants mixed down to the ground

The Draft EIS fails to address the severe adverse health impacts of PM2.5 fine particulates. According to DNR ambient monitoring data the Milwaukee area has annual average concentrations of PM2.5 that are very close to the applicable annual standard.

4.0 Interconnection/ Transmission costs: the DEIS discusses the projected \$266 million in new and/or expanded high voltage electric transmission facilities that would be necessary to connect the proposed ERGS coal units. The alternate to the ERGS, a combined-cycle project in Fond du Lac, has an estimated connection cost of \$26 million. The interconnection/ transmission costs are a substantial part of the overall cost of the project and therefore needs to be included when evaluating alternative proposals.

The size and location of all proposed ATC transmission lines should be shown on a detailed map. The maps ATC provided the PSC in DEIS (Figures Vol. 2-4 thru 2-7) only give rough idea of the transmission line routes.